

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**BTR Antivibration Systems, Inc.  
U.S. Highway 31 and 100 North  
Peru, Indiana 46970**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T103-7638-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

#### Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]
- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Three (3) rubber/metal coating operations**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) [326 IAC 8-1-6]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.5 Volatile Organic Compounds (VOC)
- D.1.6 VOC Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.7 Particulate Matter (PM)
- D.1.8 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - One (1) cryogenic deflasher, one (1) mill room**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.3 Monitoring

**D.3 FACILITY OPERATION CONDITIONS - One (1) 1.67 mmBtu/hr natural gas fired boiler**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

**Compliance Determination Requirements**

- D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**  
D.3.3 Monitoring

**Certification**  
**Emergency/Deviation Occurrence Report**  
**Quarterly Report**  
**Quarterly Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary fabricated rubber products manufacturing operation.

Responsible Official: Gregory K. Finch  
Source Address: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
Mailing Address: R.R. 6, Box 631, Peru, Indiana 46970  
Phone Number: 219-434-9800  
SIC Code: 3069  
County Location: Miami  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth, one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, each exhausting to one (1) stack (S114, S1, and S2);
- (2) One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);
- (3) One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);
- (4) One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;
- (5) One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil).

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) natural gas fired boiler, with maximum heat input capacity of 1.67 million British thermal units per hour (mmBtu/hr);

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION B GENERAL CONDITIONS**

**B.1 Permit No Defense [IC 13]**

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

**B.2 Definitions [326 IAC 2-7-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

**B.3 Permit Term [326 IAC 2-7-5(2)]**

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

**B.4 Enforceability [326 IAC 2-7-7(a)]**

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

**B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.6 Severability [326 IAC 2-7-5(5)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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This permit does not convey any property rights of any sort, or any exclusive privilege.

**B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;



- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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**B.14 Permit Shield [326 IAC 2-7-15]**

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit;  
or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
  - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:



Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

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All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

**C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 11, 1997.
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

**C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

### **SECTION D.1**

### **FACILITY OPERATION CONDITIONS**

#### **Facility Description [326 IAC 2-7-5(15)]**

One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth, one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, each exhausting to one (1) stack (S114, S1, and S2);

One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);

One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) [326 IAC 8-1-6] [326 IAC 2-1-3.4]**

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- (a) Any change or modification to the one (1) rollcoater (one of the facilities identified as EU-001), the two (2) rollcoaters (identified as EU-002), and the two (2) air atomized spray booths (identified as EU-003) that would increase the potential to emit to greater than twenty-five (25) tons per year from any facility would make that facility subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).
- (b) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), 326 IAC 2-1-3.4 (New Source Toxics Control) and Construction Permit (CP 103-9550-00021), issued June 29, 1998 for the one (1) primer spray booth and the one (1) adhesive spray booth (two of the facilities identified as EU-001):
  - (1) The Permittee will apply all coatings utilizing a spray gun with HVLP or air atomization spray applicators.
  - (2) All operators will be trained on proper application, cleanup and equipment use.
  - (3) Storage containers - when such containers are used for VOC and HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation. The total amount of VOC delivered to the applicators in the primer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, rolled on a monthly basis.

#### **D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) shall be limited by the following:  
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### **D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### **D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC), Hazardous Air Pollutant (HAP) and Particulate Matter (PM) limits specified in Conditions D.1.1(b) and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Condition D.1.1(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.6 VOC Emissions

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Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.1.7 Particulate Matter (PM)

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The dry filters shall be in operation at all times the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) are in operation.

#### D.1.8 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S102, and S103) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(b).
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;

- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### SECTION D.2

#### FACILITY OPERATION CONDITIONS

##### Facility Description [326 IAC 2-7-5(15)]

One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;

One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil).

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the one (1) cryogenic deflasher, the one (1) carbon black handling system and the one (1) Shaw Mixer shall be limited to 4.37 pounds per hour, 5.97 pounds per hour and 5.97 pounds per hour, respectively. This limitation was based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### Compliance Determination Requirements

##### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.3 Monitoring**

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1, may require these facilities to have monitoring requirements.

### **SECTION D.3 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activity: One (1) natural gas fired boiler, with maximum heat input capacity of 1.67 million British thermal units per hour (mmBtu/hr);

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the particulate matter emissions from the one (1) 1.67 mmBtu/hr boiler shall be limited to 0.60 pounds per million British thermal unit.

This limitation was established from the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

### **Compliance Determination Requirements**

#### **D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.3.3 Monitoring**

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: BTR Antivibration Systems, Inc.  
Source Address: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
Mailing Address: R.R. 6, Box 631, Peru, Indiana 46970  
Part 70 Permit No.: T103-7638-00021

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: BTR Antivibration Systems, Inc.  
Source Address: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
Mailing Address: R.R. 6, Box 631, Peru, Indiana 46970  
Part 70 Permit No.: T103-7638-00021

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten <b>(10)</b> calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: BTR Antivibration Systems, Inc.  
Source Address: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
Mailing Address: R.R. 6, Box 631, Peru, Indiana 46970  
Part 70 Permit No.: T103-7638-00021  
Facility: one (1) primer spray booth and one (1) adhesive spray booth (two of the facilities identified as EU-001)  
Parameter: Volatile Organic Compound (VOC)  
Limit: The total amount of VOC delivered to the applicators in the primer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	VOC Usage Primer	VOC Usage Adhesive	VOC Usage Primer	VOC Usage Adhesive	VOC Usage Primer	VOC Usage Adhesive

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: BTR Antivibration Systems, Inc.  
Source Address: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
Mailing Address: R.R. 6, Box 631, Peru, Indiana 46970  
Part 70 Permit No.: T103-7638-00021

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management

## Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** BTR Antivibration Systems, Inc.  
**Source Location:** U.S. Highway 31 and 100 North, Peru, Indiana 46970  
**County:** Miami  
**SIC Code:** 3069  
**Operation Permit No.:** T103-7638-00021  
**Permit Reviewer:** Holly M. Stockrahm

The Office of Air Management (OAM) has reviewed a Part 70 permit application from BTR Antivibration Systems, Inc. relating to the operation of a fabricated rubber products manufacturing operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth, one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, exhausting to three (3) stacks (S114, S1, and S2);
- (2) One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);
- (3) One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);
- (4) One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts
- (5) One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil).

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Six (6) natural gas fired air make up units, each rated at 5 million British thermal units per hour (mmBtu/hr);
- (2) One (1) natural gas fired boiler, with maximum heat input capacity of 1.67 million British thermal units per hour (mmBtu/hr);

- (3) Thirty-one (31) mold presses, each with maximum capacity of 60 pounds of uncured rubber per hour;
- (4) Thirty-eight (38) transfer-type molding presses, each capable of processing sixty (60) pounds per hour of uncured rubber;
- (5) Six (6) 300 ton injection molding presses, each capable of processing fifty-three (53) pounds per hour of uncured rubber;
- (6) Sixteen (16) Sanyu rubber presses used to manufacture rubber antivibration components with a maximum uncured rubber consumption rate of 875 pounds per hour.
- (7) One (1) CT120 Assembly;
- (8) One (1) fluid bushing process;
- (9) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour;
- (10) Combustion source flame safety purging on startup
- (11) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (12) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (13) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (14) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Construction Permit (CP 103-1960-00021), issued September 27, 1991.
- (2) Registration (CP 103-2979-00021), issued April 22, 1993.
- (3) Construction Permit (CP 103-3016-00021), issued January 19, 1994.
- (4) Amendment (A 103-5286-00021), issued February 12, 1996.
- (5) Registration (CP 103-6137-00021), issued July 18, 1996.
- (6) Construction Permit (CP 103-8682-00021), issued November 17, 1997, amended (A 103-9847-00021) on June 25, 1998.
- (7) Construction Permit (CP 103-9550-00021), issued June 24, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

## Enforcement Issue

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996.

A notice of completeness letter was mailed to the source on January 17, 1997.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Ethyl Benzene	less than 10
Xylene	greater than 10
Toluene	greater than 10
Dichlorobenzene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Volatile Organic Compound (VOC) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.000
PM-10	0.054
SO <sub>2</sub>	0.000
VOC	35.716
CO	0.000
NO <sub>x</sub>	0.000
HAP	not available

### County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The one (1) 1.67 mmBtu/hr natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the heat input capacity is less than ten (10) million British thermal units per hour.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on June 11, 1997. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential Volatile Organic Compound (VOC) emissions are less than two hundred fifty (250) tons per year and it is not one of the 28 listed source categories in this rule.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of Volatile Organic Compound (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 8-1-6 (General Reduction Requirements)**

This source coats rubber with adhesive and attaches metal parts. Rubber is the bigger component.

- (a) The one (1) rollcoater (one of the facilities identified as EU-001), the two (2) rollcoaters (identified as EU-002), and the two (2) air atomized spray booths (identified as EU-003) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because each of their potential to emit (PTE) of Volatile Organic Compound (VOC) is less than twenty-five (25) tons per year. Any change or modification that would increase the potential to emit to greater than twenty-five (25) tons per year from any facility would make that facility subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).
- (b) The one (1) HVLP primer spray booth and the one (1) HVLP adhesive spray booth (two of the facilities identified as EU-001) are subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they are considered one (1) facility and their potential to emit is greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP 103-9550-00021), issued June 29, 1998:

- (1) The Permittee will apply all coatings utilizing a spray gun with HVLP or air atomization spray applicators.
- (2) All operators will be trained on proper application, cleanup and equipment use.

- (3) Storage containers - when such containers are used for VOC and HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation. The total amount of VOC delivered to the applicators in the primer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, rolled on a monthly basis.

326 IAC 2-1-3.4 (New Source Toxics Control)

The one (1) HVLP primer spray booth and the one (1) HVLP adhesive spray booth (two of the facilities identified as EU-001) are subject to the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control) because they are considered one (1) facility and their potential to emit any single HAP is greater than ten (10) tons per year and their potential to emit all HAPs is greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control) and Construction Permit (CP 103-9550-00021), issued June 29, 1998:

- (a) The Permittee will apply all coatings utilizing a spray gun with HVLP or air atomization spray applicators.
- (b) All operators will be trained on proper application, cleanup and equipment use.
- (c) Storage containers - when such containers are used for VOC and HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

326 IAC 8-6 (Organic Solvent Emission Limitations)

None of the facilities located at this source are subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source was constructed after January 1, 19890, which is the applicability date for Miami County.

326 IAC 6-2-4 (Emission Limitations for Facilities Listed in 326 IAC 6-2-1(d))

The one (1) 1.67 million British thermal units per hour (mmBtu/hr) boiler is subject to the requirements of 326 IAC 6-2-4 (Emission Limitations for Facilities Listed in 326 IAC 6-2-1(d)) because it was constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the particulate matter emissions from the one (1) 1.67 mmBtu/hr boiler shall be limited to 0.60 pounds per million British thermal unit.

This limitation was established from the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.



For the 1.67 mmBtu/hr boiler:

$$Q = 1.67 \text{ mmBtu/hr}$$

Pt = 0.95 > 0.6. Therefore, the 1.67 mmBtu/hr boiler shall be limited to 0.6 lb/mmBtu.

The 1.67 mmBtu/hr boiler is in compliance with this requirement when using natural gas by the following equation:

$$7.6 \text{ lb PM/MMCF} * \text{MMCF}/1,000 \text{ mmBtu} = 0.0076 \text{ lb PM/mmBtu} < 0.60 \text{ lb PM/mmBtu}$$

Therefore, the 1.67 mmBtu/hr boiler is in compliance with this requirement when using natural gas.

### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001), the two (2) air atomized spray booths (EU-003), the one (1) cryogenic deflasher, the one (1) carbon black handling system and the one (1) Shaw Mixer shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (a) For the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003):

The dry filters shall be in operation at all times the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) are in operation, in order to comply with this limit.

- (b) For the one (1) cryogenic deflasher:

$$P = 2200 \text{ lb/hr} = 1.1 \text{ ton/hr} \\ E = 4.37 \text{ lb PM/hour}$$

The potential Particulate Matter (PM) emissions from the one (1) cryogenic deflasher is 1.70 lb/hr. The potential emission rate of 1.7 lb/hr is based on stack test information. Therefore, the one (1) cryogenic deflasher will comply with this requirement.

- (c) For the one (1) carbon black handling operation and the one (1) Shaw mixer:

$$P = 3500 \text{ lb/hr} = 1.75 \text{ ton/hr} \\ E = 5.97 \text{ lb PM/hour}$$

The potential Particulate Matter (PM) emissions from the one (1) carbon black handling operation and the one (1) Shaw mixer are 1.02 lb/hr. The potential PM emissions were calculated using a flour handling emission factor, because flour is similar in density and particle size to carbon black. Therefore, they will comply with this requirement.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S102, and S103) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this fabricated rubber products manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T103-7638-00021**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: BTR Antivibration Systems, Inc.  
 Source Location: U.S. Highway 31 and 100 North, Peru, Indiana 46970  
 County: Miami  
 SIC Code: 3069  
 Operation Permit No.: T103-7638-00021  
 Permit Reviewer: Cathie Moore/Holly M. Stockrahm

On April 16, 1999, the Office of Air Management (OAM) had a notice published in the Peru Tribune, Peru, Indiana, stating that BTR Antivibration Systems, Inc. had applied for a Part 70 Operating Permit to operate a stationary fabricated rubber products manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The source has submitted the following comments (~~strikeout~~ added to show what was deleted and **bold** added to show what was added).

#### Comment 1:

Please delete Conditions A.2(4), A.2 (5), A.2 (8) under the Emission Units Summary, because these are insignificant activities. In the application for CP 103-9550, this equipment was identified as sixty (60) separate facilities, each operating independently from the other and each having potentials emissions less than the thresholds specified in 326 IAC 2-7-1 (21).

#### Response to Comment 1:

IDEM, OAM, agrees. Additionally, the number format has been changed to letters. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- ~~(4)~~**(a)** One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth, one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, each exhausting to one (1) stack (S114, S1, and S2);

- ~~(2)~~(b) One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);
- ~~(3)~~(c) One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);
- ~~(4)~~ — Thirty-eight (38) transfer-type molding presses, each capable of processing sixty (60) pounds per hour of uncured rubber;
- ~~(5)~~ — Six (6) 300-ton injection molding presses, each capable of processing fifty-three (53) pounds per hour of uncured rubber;
- (6)(d) One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;
- (7)(e) One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil);
- ~~(8)~~ — Sixteen (16) Sanyu rubber presses used to manufacture rubber antivibration components with a maximum uncured rubber consumption rate of 875 pounds per hour.

#### Comment 2:

In Condition D.1.1 (b)(3) Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP), please delete the last sentence of the paragraph below (3) that reads: *The total amount of VOC delivered to the applicators in the primer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, rolled on a monthly basis.* The application for CP 103-9550 showed that potential emission (as defined by 326 IAC 1-2-55), operating at full rated capacity for 8760 hours per year is 30.1 tons per year. The BACT and MACT determination made in CP 103-9550 were made on the basis of a maximum VOC emission of 30.1 tons per year. This maximum emission was chosen to equal the potential emission precisely to avoid any possibility that the emission that formed the basis of the BACT/MACT determination could not be exceeded unless physical changes or changes to the method of operation would instituted that would change the potential emission of this facility. BTR Antivibration Systems, Incorporated is fully aware of the Permit Rules (326 IAC 2-1) which require that a revision to this permit be applied for in the event that the potential emissions from this facility changes by more than an exempt amount. At such time, the BACT and MACT determinations for this facility would be revisited. This condition is redundant to the permit rule.

#### Response to Comment 2:

The limit of 30.1 tons per year for one (1) primer spray booth and the one (1) adhesive spray booth (two of the facilities identified as EU-001) are based on information provided by the source and define the emissions from these existing operations as submitted under the Title V permit application and the BACT analysis. The level of emissions was an important consideration in the BACT analysis. Regardless of whether these limits represent potential emissions, they do represent emission limits under BACT and this permit requires a compliance demonstration.

A demonstration that these limits represent a level that could never be exceeded cannot be made since not all the relevant factors have been defined by the permit. This comment effects no change to the permit.

**Comment 3:**

Please remove Condition D.1.3 Preventive Maintenance Plan in its entirety. There is no air emission control equipment present of these processes. The application for this permit and CP 103-9550 rigorously showed that the dry filters that are present are not required to comply with the applicable particulate control rule as described in Condition D.1.3. The dry filters are in fact fire prevention measures. 326 IAC 2-7-15(13) refers to 326 IAC 2-7-4(c)(9) which in turn refers to 326 IAC 1-6-3 which refers to *"inspecting, maintaining, and repairing emission control devices."* Since there are no emission control devices present, there can be no justification for the requirement of a preventive maintenance Plan.

**Response to Comment 3:**

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for spray coating booths. The actual substrate being coated and the solids content of the coating being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. This comment effects no change to the permit.

**Comment 4:**

Condition D.1.6 VOC Emissions is acceptable if the last sentence of Condition D.1.1 (b) is deleted as requested for the same reasons as Comment 1.

**Response to Comment 4:**

IDEM, OAM, agrees. Reporting is not required for this limit. Condition D.1.6 shall be deleted.

**Comment 5:**

Please delete Condition D.1.7 Particulate Matter in its entirety. The application showed that these processes comply with the particulate rule cited in Condition D.1.2 without the benefit of any emission control devices. Therefore, there is no justification for requiring that these filters be in operation to comply with Condition D.1.2.

**Response to Comment 5:**

IDEM, OAM, does not agree. Please see Response to Comment 3. This comment effects no change to the permit.

**Comment 6:**

Please delete Condition D.1.8(a) Monitoring in its entirety. As has previously been shown, the operation of the filters is irrelevant to compliance with Condition D.1.2 and 326 IAC 6-3. Therefore, there can be no justification for any requirement for inspections of these filters.

**Response to Comment 6:**

IDEM, OAM, does not agree. Please see Response to Comment 3. This comment effects no change to the permit.

**Comment 7:**

Please delete Condition D.1.8(b) Monitoring in its entirety. Condition D.1.2 and 326 IAC 6-3-2 allow these processes to emit a mass of particulate as limited by the condition and the rule. The thrust of this condition is to demand zero emissions, and that is in variance to the rule. Even in the shortest month of the year, there are 672 hours in a month. If a process were emitting a compliant mass of particulate, the chances are that some will deposit on the roof or the ground. It takes only a minuscule amount of coating to indicate a "presence." Since this condition is at odds with the applicable rule, 326 IAC 2-7-6(1) do not provide any justification for this condition.

**Response to Comment 7:**

IDEM, OAM, does not agree. The permittee's inspections of the equipment may show that the equipment was not operating in its normal range, not zero emissions, but with a noticeable change in emissions which could indicate the need for maintenance.

**Comment 8:**

Please delete Condition D.1.8(c) Monitoring in its entirety. As the preventive maintenance plan was discredited earlier, there is no justification for referring to preventive maintenance plan that has no justification for existence.

**Response to Comment 8:**

IDEM, OAM, does not agree. Please see Response to Comment 3. This comment effects no change to the permit.

**Comment 9:**

Please delete Condition D.1.9(a) Record Keeping in its entirety. As the basis of the BACT/MACT determination in CP103-9550 was made on the basis of the potential emission for the facility, there is no reason for the requirement of record keeping to show that the potential emission has not been exceeded. Such an exceedance would physically require to either changes in equipment or methods of production had been made that would have the effect of increasing emissions. Such changes would require a revision to this permit. This permit, nor any other operating permit has conditions that require record keeping to show that another revision is not required.

**Response to Comment 9:**

IDEM, OAM, does not agree. Please see Response to Comment 2. This comment effects no change to the permit.

**Comment 10:**

Please delete Condition D.1.9(b) Record Keeping in its entirety. As previous comments showed that the underlying limitation is not justified. Therefore, record keeping requirements are unjustified as well.

**Response to Comment 10:**

IDEM, OAM, does not agree. Please see Response to Comment 2. This comment effects no change to the permit.

**Comment 11:**

Please delete Condition D.1.10 Reporting in its entirety. As previous comments showed that the underlying limitation is not justified. Therefore, reporting requirements are unjustified as well.

**Response to Comment 11:**

IDEM, OAM, agrees. No reporting is required to verify the potential to emit has not been exceeded. Condition D.1.10 and the report form has been deleted.

**Comment 12:**

Please delete items (4), (5), and (8) under Section D.2 Description. These are insignificant activities. See Comment 1.

**Response to Comment 12:**

IDEM, OAM, agrees. The description box under D.2 shall be changed as follows:

Facility Description [326 IAC 2-7-5(15)]	
(4)	<del>Thirty-eight (38) transfer-type molding presses, each capable of processing sixty (60) pounds per hour of uncured rubber;</del>
(5)	<del>Six (6) 300-ton injection molding presses, each capable of processing fifty-three (53) pounds per hour of uncured rubber;</del>
(6)(d)	One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;
(7)(e)	One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil);
(8)	<del>Sixteen (16) Sanyu rubber presses used to manufacture rubber antivibration components with a maximum uncured rubber consumption rate of 875 pounds per hour.</del>

**Comment 13:**

Please delete items (4), (5), and (8) from the listing of emission units in the Technical Support Document (TSD) Permitted Emission Units, and put them in the listing of insignificant activities.



These are insignificant activities. See Comment 1.

**Response to Comment 13:**

IDEM, OAM, does not change the TSD after the public comment period. This document, the TSD Addendum, serves to record changes. OAM has revised the number format of the insignificant activities to a letter format as well. The listing of insignificant activities has been change as follows:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour; One (1) 1.67 mmBtu/hr boiler, Six (6) natural gas fired air make up units, each rated at 5 million British thermal units per hour (mmBtu/hr);
- (b) One (1) natural gas fired boiler, with maximum heat input capacity of 1.67 million British thermal units per hour (mmBtu/hr);
- (c) Thirty-one (31) mold presses, each with maximum capacity of 60 pounds of uncured rubber per hour;
- (d) Thirty-eight (38) transfer-type molding presses, each capable of processing sixty (60) pounds per hour of uncured rubber;
- (e) Six (6) 300 ton injection molding presses, each capable of processing fifty-three (53) pounds per hour of uncured rubber;
- (f) Sixteen (16) Sanyu rubber presses used to manufacture rubber antivibration components with a maximum uncured rubber consumption rate of 875 pounds per hour;
- (g) One (1) CT120 Assembly;
- (h) One (1) fluid bushing process;
- (i) Combustion source flame safety purging on startup;
- (j) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (k) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (m) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.

**Comment 14:**

Please delete in the TSD, State Rule Applicability - Individual Facilities, 326 IAC 8-1-6(b)(3), the last sentence of the paragraph that reads, *The total amount of VOC delivered to the applicators in the primer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, rolled on a monthly basis.* Please also include entries that Operation Condition 11 of CP 103-9550 is specifically and explicitly superseded by the condition in this Title V permit which deletes the last sentence. If applicable please insert such language into the appropriate part of the permit document. See Comment 2: The application for CP 103-9550 showed that potential emission (as defined by 326 IAC 1-2-55), operating at full rated capacity for 8760 hours per year is 30.1 tons per year. The BACT and MACT determination made in CP 103-9550 were made on the basis of a maximum VOC emission of 30.1 tons per year. This maximum emission was chosen to equal the potential emission precisely to avoid any possibility that the emission that formed the basis of the BACT/MACT determination could not be exceeded unless physical changes or changes to the method of operation would be instituted that would change the potential emission of this facility. BTR Antivibration Systems, Incorporated is fully aware of the Permit Rules (326 IAC 2-1) which require that a revision to this permit be applied for in the event that the potential emissions from this facility changes by more than an exempt amount. At such time, the BACT and MACT determinations for this facility would be revisited. This condition is redundant to the permit rule.

**Response to Comment 14:**

IDEM, OAM, does not agree. Please see Response to Comment 2.

**Comment 15:**

Please delete in the TSD, the paragraph under Compliance Requirements, 1(a), in its entirety. Please include entries that Operation Condition 10(c) of CP 103-9550 is specifically and explicitly superseded by deletion. If applicable, please insert such language into the appropriate part of the permit document. See Comment 6: As has previously been shown, the operation of the filters is irrelevant to compliance with Condition D.1.2 and 326 IAC 6-3. Therefore, there can be no justification for any requirement for inspections of these filters. Additionally, this corrects an error in the construction permit.

**Response to Comment 15:**

IDEM, OAM, does not agree. Please see Response to Comment 3.

**Comment 16:**

Please delete TSD Compliance Requirements (1)(b) in its entirety. See Comment 7: 326 IAC 6-3-2 allows these processes to emit a mass of particulate as limited by the condition and the rule. The thrust of this condition is to demand zero emissions, and that is in variance to the rule. Even in the shortest month of the year, there are 672 hours in a month. If a process were emitting a compliant mass of particulate, the chances are that some will deposit on the roof or the ground. It takes only a minuscule amount of coating to indicate a "presence." Since this condition is at odds with the applicable rule, 326 IAC 2-7-6(1) do not provide any justification for this condition.

**Response to Comment 16:**

IDEM, OAM, does not agree. Please see Response to Comment 7.

**Comment 17:**

In the TSD Previous Permits, please include an entry that specifically and explicitly supersedes by deletion Operation Condition 3 of CP 103-9550. If applicable, please insert such language into the appropriate part of the permit document. See Comment 3, and to correct an error in the construction permit: There is no air emission control equipment present of these processes. The application for this permit and CP 103-9550 rigorously showed that the dry filters that are present are not required to comply with the applicable particulate control rule as described in Condition D.1.3. The dry filters are in fact fire prevention measures. 326 IAC 2-7-15(13) refers to 326 IAC 2-7-4(c)(9) which in turn refers to 326 IAC 1-6-3 which refers to *"inspecting, maintaining, and repairing emission control devices."* Since there are no emission control devices present, there can be no justification for the requirement of a preventive maintenance Plan.

**Response to Comment 17:**

IDEM, OAM, does not agree. Please see Response to Comment 3.

**Comment 18:**

In the TSD Previous Permits, please include an entry that specifically and explicitly supersedes by deletion Operation Condition 10(a) and (b) of CP 103-9550. If applicable, please insert such language into the appropriate part of the permit document. See Comments 5 and 6, and to correct an error in the construction permit: The application showed that these processes comply with the 326 IAC 6-3-2 without the benefit of any emission control devices. Therefore, there is no justification for requiring that these filters be in operation to comply. 326 IAC 6-3-2 allows these processes to emit a mass of particulate as limited by the condition and the rule. The thrust of this condition is to demand zero emissions, and that is in variance to the rule. Even in the shortest month of the year, there are 672 hours in a month. If a process were emitting a compliant mass of particulate, the chances are that some will deposit on the roof or the ground. It takes only a minuscule amount of coating to indicate a "presence." Since this condition is at odds with the applicable rule, 326 IAC 2-7-6(1) do not provide any justification for this condition.

**Response to Comment 18:**

IDEM, OAM, does not agree. Please see Response to Comments 3 and 7.

**Comment 19:**

In the TSD Previous Permits, please include an entry that specifically and explicitly supersedes by deletion Operation Condition 14 of CP 103-9550. If applicable, please insert such language into the appropriate part of the permit document. See Comment 10, and to correct errors in the construction permit: As previous comments showed that the underlying limitation is not justified. Therefore, record keeping requirements are unjustified as well.

**Response to Comment 19:**

IDEM, OAM, does not agree. Please see Response to Comment 2.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: BTR Antivibration Systems, Inc.**  
**Address City IN Zip: U.S. Highway 31 and 100 North, Peru, Indiana 46970**  
**Part 70: T103-7638-00021**  
**Pit ID: 103-00021**  
**Reviewer: Catherine Moore**  
**Date: January 22, 1999**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-001 [Rollcoater (Chemlok 6887-35)]	8.2	73.90%	0.0%	73.9%	0.0%	15.90%	0.00011	3600.000	6.06	6.06	2.40	57.59	10.51	0.00	38.11	100%
EU-001 [Primer Spray Booth (Chemlok 205)]	7.3	87.85%	0.0%	87.9%	0.0%	7.50%	0.00030	1800.000	6.39	6.39	3.45	82.77	15.11	0.52	85.16	75%
EU-001 [Adhesive Spray Booth (Chemlok 6887-35)]	8.0	80.42%	0.0%	80.4%	0.0%	15.90%	0.00030	1800.000	6.41	6.41	3.46	83.07	15.16	0.92	40.31	75%
EU-002 [Link Line #1 (Chemlok 7701)]	7.6	97.10%	0.0%	97.1%	0.0%	2.00%	0.00052	515.000	7.38	7.38	1.99	47.80	8.72	0.00	368.98	100%
EU-002 [Link Line #1 (Polyurethane Blend)]	8.8	65.00%	0.0%	65.0%	0.0%	38.30%	0.00053	515.000	5.72	5.72	1.55	37.19	6.79	0.00	14.93	100%
EU-002 [Link Line #2 (Chemlok 7701)]	7.6	97.10%	0.0%	97.1%	0.0%	2.00%	0.00052	515.000	7.38	7.38	1.99	47.80	8.72	0.00	368.98	100%
EU-002 [Link Line #2 (Polyurethane Blend)]	8.8	65.00%	0.0%	65.0%	0.0%	38.30%	0.00053	515.000	5.72	5.72	1.55	37.19	6.79	0.00	14.93	100%
EU-003 [Booth #1 (Cashew 709)]	11.1	99.00%	95.9%	3.1%	3.6%	0.70%	0.00550	250.000	0.36	0.34	0.47	11.38	2.08	0.33	49.25	50%
EU-003 [Booth #2 (Cashew 709)]	11.1	99.00%	95.9%	3.1%	3.6%	0.70%	0.00550	250.000	0.36	0.34	0.47	11.38	2.08	0.33	49.25	50%

**State Potential Emissions**

**Add worst case coating to all solvents**

**17.34**

**416.15**

**75.95**

**2.11**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used